

JASON M. FRIERSON
United States Attorney
Nevada Bar No. 7709
JULIE A.K. CUMMINGS, SBN HI 10635
Special Assistant United States Attorney
Office of Program Litigation, Office 7
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (410) 966-1551
Facsimile: (415) 744-0134
E-Mail: Julie.Cummings@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA MICHELLE RAMIREZ,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case 2:22-cv-01734-DJA

UNOPPOSED MOTION FOR
EXTENSION OF TIME
(*FIRST REQUEST*)

Defendant, the Acting Commissioner of Social Security, respectfully requests an extension of 30 days in which to respond to Plaintiff's Motion for Reversal and/or Remand (ECF No. 12), filed on February 2, 2023, changing the date on which Defendant's response is due to April 5, 2023, from March 6, 2023. This is Defendant's first request for an extension to respond to Plaintiff's motion. Counsel for Defendant conferred with a representative for counsel for Plaintiff on March 3, 2023, and confirmed that Plaintiff has no objection to this request.

Defendant makes this request in good faith and for good cause. Due to workload concerns arising from an unanticipated spike in cases, exacerbated by several long-term leaves of absence in the undersigned's office, multiple cases were recently reassigned to the undersigned. Several such cases require imminent responses. The extension is required to allow the undersigned attorney

1 time to review the record in this case and respond appropriately to Plaintiff's motion. Broadly, in
2 her role of attorney at the Office of the General Counsel's Office of Program Litigation, Office 7,
3 the undersigned is currently assigned 32 cases at various stages of litigation. The undersigned has
4 been unable to complete the review of this case, and the drafting of the brief, due to having multiple
5 court filing dates within a compressed period. Specifically, the undersigned has been actively
6 working on six district court briefs, including this one, all due for filing within a short 10-day
7 period. Despite this diligence, the undersigned is unable to complete the brief in this case within
8 the present filing deadline. The undersigned requests this first extension to allow the undersigned
9 the time needed to properly represent Defendant in this matter.

10 For these reasons, the Commissioner respectfully requests that the Court grant this motion
11 for an extension of 30 days for Defendant to respond to Plaintiff's Opening Brief.

12 DATED March 3, 2023.

Respectfully submitted,

13 JASON M. FRIERSON
14 United States Attorney

15 s/ Julie A.K. Cummings
16 JULIE A.K. CUMMINGS
17 Special Assistant United States Attorney

18 Attorneys for Defendant

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21 IT IS SO ORDERED:

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23 HON. DANIEL J. ALBREGTS
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: March 7, 2023
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